



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

March 24, 2015

BY ECF

The Honorable Loretta A. Preska
Chief United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007


**Re: United States v. Ericson Vargas Cardona
S1 11 Cr. 349 (LAP)**

Dear Judge Preska:

The Government writes, with defendant Ericson Vargas Cardona's consent, to respectfully request an adjournment of the plea currently scheduled for March 30, 2015. The parties have been engaged in extensive discussions about a potential disposition of the case, and the parties are close to finalizing the terms of a plea agreement. In order to allow additional time for these discussions and to allow adequate time for the defendant to review the proposed plea offer with counsel, the Government requests that the Court adjourn the plea to April 14, 2015 at 12:00 p.m. The Government also moves, with the defendant's consent, to exclude the time between March 30, 2015 and April 14, 2015 in the interests of justice, to allow the parties to continue discussing a possible resolution of this matter prior to trial. See 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted,

PREET BHARARA
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